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6 Attorneys for Plaintiff  
7 LESA, LLC

8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION

12 **LESA, LLC**, a Delaware Limited Liability  
Company;

13 Plaintiff,

14 v.

15 **Family Trust of Kimberly and Alfred**  
16 **Mandel**, a California Trust;  
17 **2000 Jackson Family Trust**, a California  
Trust;  
18 **Richard “Dick” Taylor**, an individual;  
19 **James Fisher**, an individual; and  
**Christine Williams**, an individual;

20 Defendants.

Case No. 4:15-cv-05574-KAW

**STIPULATION AND ~~PROPOSED~~ ORDER**  
**ENLARGING TIME RE: DEFENDANTS’**  
**MOTION TO DISMISS.**

**STIPULATION ENLARGING TIME RE: DEFENDANTS' MOTION TO DISMISS**

This Stipulation is entered into by Plaintiff LESA, LLC and Defendants Family Trust of Kimberley and Alfred Mandel, 2000 Jackson Family Trust, Richard "Dick" Taylor, James Fisher, and Christine Williams (collectively, "Defendants") by their respective counsel.

**RECITALS**

A. Plaintiff LESA, LLC filed its Complaint on December 4, 2015 (Dkt. 1)

B. Defendants filed their Motion to Dismiss the Complaint (the "Motion") on December 23, 2015 (Dkt. 7), set for hearing on February 4, 2016. Under Civil Local Rule 7-3, Plaintiff's deadline to file its Opposition to the Motion is January 6, 2016.

C. Counsel for Plaintiff was unavailable due to personal reasons for an extended period of time between December 24, 2015 and January 4, 2016.

**STIPULATION**

To accommodate Counsel's personal situation, the Parties hereby stipulate to modify the briefing schedule for the Motion as follows:

Plaintiff's Opposition Due: Wednesday, January 20, 2016

Defendants' Reply Due: Wednesday, January 27, 2016

Hearing: Thursday, February 4, 2016<sup>18</sup>

**IT IS SO STIPULATED.**

COMPUTERLAW GROUP LLP

Dated: January 4, 2016

By: /s/ Jack Russo  
Jack Russo  
Christopher Sargent

Attorneys for Plaintiff  
LESA, LLC.

ROYSE LAW FIRM, PC

Dated: January 4, 2016

By: /s/ Thomas E. Moore III  
Thomas E. Moore III  
Lisa Chapman

Attorneys for Defendants  
FAMILY TRUST OF KIMBERLEY AND ALFRED  
MANDEL, 2000 JACKSON FAMILY TRUST,  
RICHARD TAYLOR, JAMES FISHER, AND  
CHRISTINE WILLIAMS.

**ATTESTATION OF E-FILED SIGNATURE**

I, Jack Russo, am the ECF user whose ID and password are being used to file this declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas E. Moore III has concurred in this filing's content and has authorized this filing.

Dated: January 4, 2016

By: /s/ Jack Russo  
Jack Russo

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 01/11, 2016

  
Non. Kandis A. Westmore  
United States Magistrate Judge